



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SMF/KCB/DEL/GK/NG
F. #2018R01401

271 Cadman Plaza East
Brooklyn, New York 11201

November 22, 2024

By E-mail and ECF

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Counsel for Rachel Cherwitz

Re: United States v. Rachel Cherwitz and Nicole Daedone
Criminal Docket No. 23-146 (DG)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery is being produced to you pursuant to the Protective Order in the above-captioned matter, entered on November 15, 2024. ECF Dkt. No. 207.

I. The Government's Discovery

A. Documents and Tangible Objects

- American Express credit card records relating to Nicole Daedone (ONETASTE00266373 through ONETASTE00266699); and
- GROUPME communications concerning OneTaste provided by Individual #15 (ONETASTE00266700 through ONETASTE00269453), which the government notes, in an abundance of caution, contain information which may be favorable to the defense.

You may examine physical evidence discoverable under Rule 16, including original documents, by calling us to arrange a mutually convenient time.

The government renews its request for reciprocal discovery from the defendants. Please note that the defendants' obligations under Fed. R. Crim. P. 16(b) include identification of "all non-impeachment exhibits [the defendants] intend to use in their defense at trial, whether the exhibits will be introduced through a government witness or a witness called by a Defendant." United States v. Napout, No. 15-CR-252 (PKC), 2017 WL 6375729, at *7 (E.D.N.Y. Dec. 12, 2017); accord United States v. Smothers, No. 20-CR-213 (KAM), 2023 WL 348870, at *22 (E.D.N.Y. Jan. 20, 2023).

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/
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cc: Clerk of the Court (DG) (by ECF) (without enclosures)

